

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: PATRICIA ANNE WARNER
Debtor(s)

JACK N. ZAHAROPOULOS
CHAPTER 13 TRUSTEE

Movant

vs.

PATRICIA ANNE WARNER
Respondent(s)

CHAPTER 13

CASE NO: 1-21-00853-HWV

TRUSTEE'S MOTION TO DISMISS CASE

AND NOW, on October 12, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney James K. Jones, Esquire, and respectfully represents the following:

1. A Plan was filed on April 16, 2021.
2. A hearing was held and an Order was entered on August 11, 2021 directing that an amended plan be filed within thirty (30) days.
3. As of the date of this Motion, an amended plan has not been filed.
4. The delay in filing a confirmable plan in this case is prejudicial to creditors.

WHEREFORE, your Trustee respectfully requests your Honorable Court dismiss the case upon the basis that Debtors have failed to propose a confirmable plan.

Respectfully submitted,

s/ James K. Jones, Esq.

Id: 39031

Attorney for Trustee

Jack N. Zaharopoulos

Standing Chapter 13 Trustee

Ste. A, 8125 Adams Drive

Hummelstown, PA 17036

Ph. 717-566-6097

Fax. 717-566-8313

eMail: jjones@pamd13trustee.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: PATRICIA ANNE WARNER

CHAPTER 13

Debtor(s)

JACK N. ZAHAROPOULOS
CHAPTER 13 TRUSTEE
Movant

CASE NO: 1-21-00853-HWV

NOTICE

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for failure to file a confirmable Chapter 13 Plan.

YOU ARE HEREBY NOTICED that a hearing has been scheduled on this matter for:

Ronald Reagan Federal Bldg
Bankruptcy Courtroom, 3rd Floor
228 Walnut Street
Harrisburg, PA 17101

Date: November 24, 2021

Time: 09:35 AM

Any objection or response filed must be filed with the Clerk, U.S. Bankruptcy Court and served on the Chapter 13 Trustee.

Jack N. Zaharopoulos, Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
Phone: (717) 566-6097
Email: info@pamd13trustee.com

Dated: October 12, 2021

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IN RE: PATRICIA ANNE WARNER

Debtor(s)

JACK N. ZAHAROPOULOS
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CHAPTER 13

Movant

PATRICIA ANNE WARNER

CASE NO: 1-21-00853-HWV

Respondent(s)

CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on October 12, 2021, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1st Class mail from Hummelstown, PA, unless served electronically.

DAWN MARIE CUTAIA, ESQUIRE
115 EAST PHILADELPHIA STREET
YORK, PA 17401-

Served electronically

United States Trustee
228 Walnut Street
Suite 1190
Harrisburg, PA 17101

Served electronically

PATRICIA ANNE WARNER
47 JAMISON DRIVE
YORK, PA 17402

Served by 1st Class Mail

I certify under penalty of perjury that the foregoing is true and correct.

Date: October 12, 2021

Respectfully,
Vickie Williams
for Jack N. Zaharopoulos, Trustee
Suite A, 8125 Adams Dr.
Hummelstown, PA 17036
Phone: (717) 566-6097
eMail: info@pamd13trustee.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: PATRICIA ANNE WARNER

| | |
|----------------------|-------------------------|
| Debtor(s) | CHAPTER 13 |
| JACK N. ZAHAROPOULOS | |
| CHAPTER 13 TRUSTEE | |
| Movant | |
| PATRICIA ANNE WARNER | CASE NO: 1-21-00853-HWV |
| Respondent(s) | |

ORDER DISMISSING CASE

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is dismissed. The Court retains jurisdiction to rule on any timely filed fee application.